



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region8

April 6, 2022

Ref: ORC-C

**GENERAL NOTICE LETTER
DEMAND FOR PAYMENT
NOTICE OF INTENT TO PERFECT LIEN
URGENT LEGAL MATTER
PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

Pride of the West, LLC
c/o Mr. Todd C. Hennis, Managing Member and Registered Agent
15100 Foothill Road
Golden, Colorado 80401

Mr. Todd C. Hennis, individually
15100 Foothill Road
Golden, Colorado 80401

Re: Notice of Potential Liability, Demand for Payment, and Notice of Intent to Perfect a Lien;
Pride of the West Mill Site, Town of Silverton, San Juan County, Colorado

Dear Mr. Hennis:

This letter provides notice of potential liability and a demand for reimbursement of response costs in connection with the Pride of the West Mill Superfund Site (Site) located in San Juan County, Colorado. This letter also provides notice of intent to perfect a Superfund lien against the property encompassing the Site located at 2201 County Road 2, Silverton, Colorado, parcel number 48290010010091 (Property). The U.S. Environmental Protection Agency is charged with responding to the release or threatened release of hazardous substances, pollutants and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA, commonly referred to as "Superfund"), 42 U.S.C. §§ 9601-9675.

Site History

The EPA has documented the release and threatened release of hazardous substances into the environment at the Site, located approximately four miles northeast of Silverton, Colorado. The Site encompasses the former Pride of the West mill facility (Facility) including several buildings situated on the Howardsville Placer mining claim. There are three residential properties located near the Site, and the road adjacent to the Site is heavily used by tourists and residents of Silverton.

The Colorado Division of Reclamation, Mining and Safety (DRMS) issued a permit to operate the Facility that was revoked on December 15, 2016, due to the failure to address an overflowing tailings pond that was adversely impacting the Animas River. During a May 11, 2021, inspection of the Facility, DRMS identified numerous drums, bags and containers in various states of disrepair, including 44 drums containing sodium cyanide. On May 17, 2021, the Colorado Department of Public Health and Environment notified the EPA of its concern regarding unsecured chemicals at the Facility and requested assistance. On May 21, 2021, an EPA response team began its evaluation of the Site. The team identified hazardous substances, pollutants or contaminants in numerous old drums and containers, many of which were compromised and leaking.

The EPA response team observed that the Facility buildings were in various states of decay and dilapidation. The roof of the mill building was leaking in several places and there were several inches of standing water in the basement. There was evidence of possible trespass inside the lab building. These conditions, combined with the deteriorating drums containing sodium cyanide evidenced a release or threatened release of hazardous substances from the Facility.

On June 21, 2021, due to environmental and human health risks associated with exposure to various hazardous substances, pollutants or contaminants, particularly sodium cyanide, the EPA deployed a response team to remove and package the drums and containers for disposal and secure the Site against trespassers. The EPA prioritized sampling and inventorying the contents of the old drums and containers and performing analyses to determine the contents' properties and compatibility with other chemicals. The response team inventoried a total of 664 drums and containers and completed 101 hazard classification analyses.

The team then focused on segregating drums and containers according to their compatible chemical properties, transferring the chemicals to new containers, and preparing them for removal and disposal. Ultimately, a total of three conex boxes containing chemical containers were removed and transported to disposal facilities. After clearing three docking bays to support staging and consolidation of chemicals in drums and containers, the team staged, packaged, and stored both the neutral and caustic liquid wastes on the Site. In July 2021, the team began shipping the secured chemicals to proper disposal facilities and sending the empty containers to a landfill. The EPA sent the last shipment in November 2021.

Notice of Potential Liability

Under CERCLA, the EPA is responsible for responding to a release or threat of a release of hazardous substances, pollutants or contaminants into the environment – that is, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. The EPA has documented that such a release has occurred at the Site. The EPA has spent public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Site.

Under Section 107(a) of CERCLA, potentially responsible parties (PRPs) may be held liable for all costs incurred by the EPA (including interest) in responding to any release or threatened release of hazardous substances at the Site, unless the PRP can demonstrate divisibility or assert one of the statutory defenses. PRPs include current and former owners and operators of the Site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the Site and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

Based on the information collected, the EPA believes that the Pride of the West, LLC may be liable under Section 107(a) of CERCLA with respect to the Site as a current owner and/or operator of the Site. Further, the EPA believes that Todd Hennis in his individual capacity may be liable under Section 107(a) of CERCLA with respect to the Site as a current operator of the Site, having managed, directed, or conducted operations specifically related to pollution at the Site.

Demand for Reimbursement of Costs

In accordance with Section 104 of CERCLA, the EPA has already taken certain response actions, which are described above, and incurred certain costs in response to conditions at the Site. The EPA is seeking to recover from Pride of the West, LLC and Todd Hennis its response costs and all interest authorized to be recovered under Section 107(a) of CERCLA. To date, the approximate total response costs identified through November 30, 2021, for the Site are \$673,172.47. Under Section 107(a) of CERCLA, the EPA hereby makes a demand for payment from Pride of the West, LLC and Todd Hennis for the above amount plus all interest authorized to be recovered under Section 107(a). A summary of these costs is enclosed as Attachment 1.

Financial Concerns/Ability to Pay Settlements

The EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a site may be substantially limited. If you believe and can document that you fall within that category, please contact EPA Region 8 Attorney Marissa Garcia by phone at (303) 312-6220 or by email at Garcia.Marissa@epa.gov for information on "Ability to Pay Settlements." In response, you will receive a package of information about the potential for these settlements and a form to fill out with information about your finances, and you will be asked to submit financial records, including business federal income tax returns. If the EPA concludes that you have a legitimate inability to pay the full amount of the EPA's costs, then the EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Notification of Intent to Perfect Superfund Lien

Pursuant to CERCLA Section 107(I), 42 U.S.C. §9607(I), a Superfund lien arises on a property where the United States has expended public funds to clean up contamination at the property. A Superfund lien allows the United States to recover response costs from parties liable under CERCLA Section 107(a) and replenish the Superfund Trust Fund. The lien continues until the liability for EPA's response costs has been satisfied or has become unenforceable through the operation of the statute of limitations provided in CERCLA Section 113(g), 42 U.S.C. §9613(g).

As stated above, the EPA has expended public funds in taking response activities pursuant to CERCLA at the Property. Information from the San Juan County Clerk's Office provides as follows:

Pride of the West LLC, acquired parcel number 48290010010091 from Bruce Conrad, Sheriff, San Juan County, Colorado, by Sheriff's Deed dated September 23, 2015.

As stated above, the EPA has reason to believe that Pride of the West, LLC is liable under CERCLA Section 107(a) to reimburse the United States for funds that the EPA has expended and will expend in addressing hazardous substances at the Site.

The EPA has assembled a Lien Filing Record consisting of records or documents relating to and supporting the filing of a lien. A copy of the index to the Lien Filing Record is enclosed with this letter (see Attachment 2) and you may receive a copy of the documents in the Lien Filing Record by requesting them from EPA Region 8 Attorney Marissa Garcia by phone at (303) 312-6220 or by email at Garcia.Marissa@epa.gov.

The EPA has reviewed the information in the Lien Filing Record and believes that the statutory elements for the lien have been satisfied. Accordingly, the EPA intends to perfect this lien by filing a Notice of Federal Lien in the San Juan County Clerk's Office, as provided in CERCLA Section 107(I)(3), 42 U.S.C. §9607(I)(3).

The Pride of the West, LLC may, within 14 days from the date of this letter, object to the perfection of the lien if it believes that the EPA is in error concerning matters of fact or law relied upon by the EPA for the establishment of the lien. An objection should be in writing and should describe the basis for contending that the EPA does not have a statutory basis to perfect the lien pursuant to Section 107(I) of CERCLA. The Pride of the West, LLC may request an appearance before a neutral EPA official to present the information it believes would contradict the EPA's right to assert or perfect the lien. The written objection and/or request for a conference should be sent by the Pride of the West, LLC or by its respective representative, together with any supporting documentation, to EPA Region 8 Site Attorney Marissa Garcia via email at:

Marissa Garcia
Office of Regional Counsel
US EPA – Region 8
Garcia.Marissa@epa.gov

EPA staff will review any written submission by or on behalf of the Pride of the West, LLC. If, after the review, EPA staff agrees that the EPA does not have a reasonable basis to assert the lien, the EPA will forbear from perfecting the lien and will notify the Pride of the West, LLC of this determination. However, if after this review, EPA staff still believes that the EPA has a basis to assert the lien pursuant to CERCLA Section 107(I), then EPA staff will refer the written submission to a neutral EPA official selected for the purpose of reviewing both the written submission of the Pride of the West, LLC and the EPA's Lien Filing Record.

If the Pride of the West, LLC or its representative requests a conference as provided above, the EPA will contact the requester to schedule it. The Pride of the West, LLC may attend a conference by phone or virtual meeting platform, such as Microsoft Teams. At the conference, the EPA will be represented by enforcement staff, including a representative from the Office of Regional Counsel, and the Pride of the West, LLC may be represented by their counsel or other representative.

The conference will be an informal hearing in which the Pride of the West, LLC may provide the EPA with information and/or documentation supporting why it disputes the EPA's conclusions with respect to the lien. The conference is not an evidentiary hearing and would not constitute a proceeding for a legally binding determination of liability for the response costs incurred by the EPA in connection with the Property. No official stenographic record will be made, and the conference will not be conducted using rules of evidence or formal administrative procedures. The sole issue to be addressed at the

conference will be whether the EPA has a reasonable basis to perfect the lien under Section 107(l) of CERCLA with regard to the Property.

After reviewing the written submissions and conducting a conference (if one is requested), the neutral EPA official will issue a recommended decision based upon the Lien Filing Record and the other information received. The recommended decision will state whether the EPA has a reasonable basis to perfect the lien and the decision will be forwarded for action to the EPA official delegated to execute liens. The Pride of the West, LLC will be provided with a copy of the recommended decision and will be notified of the EPA's action.

Neither the Pride of the West, LLC nor the EPA shall be deemed to have waived any rights, nor shall either the Pride of the West, LLC or the EPA be prohibited from asserting any claim or defense in any subsequent legal or administrative proceeding by reason of participation in the lien processes described in this letter, whether on account of the submission of any objection to the lien, the request for or participation in a conference, the submission of documents or information, or the issuance of a recommended decision by EPA staff or a neutral EPA official.

Resources and Information for Small Businesses

As you may be aware, on January 11, 2002, President Bush signed into law the Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law at <https://www.epa.gov/brownfields/brownfields-laws-and-regulations> and can review EPA guidance regarding these exemptions at <https://www.epa.gov/superfund/superfund-policy-reports-and-other-documents>.

The EPA has developed a fact sheet intended to inform small businesses of their right under the Small Business Regulatory Enforcement Fairness Act (SBREFA) (Public Law No.104-121) to comment to an Ombudsman about EPA enforcement activity. This fact sheet also provides information on compliance assistance available to small businesses. The fact sheet can be found at <https://www.epa.gov/sites/default/files/2017-06/documents/smallbusinessinfo.pdf>. The EPA is including this information without making a determination whether the company is a small business as defined by Section 222 of SBREFA or related provisions.

Information to Assist You

For additional Site information, we direct your attention to the Site response webpage at response.epa.gov/prideofthewestmill, which includes Site maps and the Administrative Record for the EPA's removal action.

Please give this matter your immediate attention and consider consulting with an attorney. The EPA is extending to you an opportunity to meet with EPA staff to discuss any legal, technical or environmental questions you may have. Considering the COVID-19 pandemic, the EPA proposes meeting by phone or virtual meeting platform, such as Microsoft Teams. To schedule the meeting please call or have your

attorney contact EPA Region 8 Attorney Marissa Garcia by phone at (303) 312-6220 or by email at Garcia.Marissa@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Thompson", written over a horizontal line.

Christopher Thompson
Associate Regional Counsel for Enforcement
EPA Region 8, Office of Regional Counsel

Attachments:

1. Cost Summary
2. Lien Filing Record Index

cc: Betsy Smidinger, EPA, Division Director, Superfund Emergency Management
Karissa Roskind, EPA, Attorney, Office of Site Remediation

ATTACHMENT 1

Cost Summary

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Itemized Cost Summary

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94
EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283
COSTS FROM 01/01/2021 THROUGH 11/30/2021

REGIONAL PAYROLL COSTS	\$40,002.81
REGIONAL TRAVEL COSTS	\$16,507.90
EMERGENCY RAPID RESPONSE SERVICES (ERRS)	
ENVIRONMENTAL RESTORATION, L.L.C. (68HE0820D0002)	\$256,761.67
SUPERFUND TECHNICAL ASSIST RESPONSE TEAM (STR)	
TETRA TECH, INC. (68HE0820D0001)	\$89,849.08
EPA INDIRECT COSTS	\$270,051.01
Total Site Costs:	<u>\$673,172.47</u>

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Regional Payroll Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94
EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283
COSTS FROM 01/01/2021 THROUGH 11/30/2021

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
BOWKER, JOHN TAYLOR ENVIRONMENTAL ENGINEER	2021	20	45.00	1,301.12
			<u>45.00</u>	<u>\$1,301.12</u>
GUY, KERRY Environmental Engineer (Osc)	2021	17	22.00	1,723.14
		18	80.00	4,636.54
		19	14.00	1,351.55
		20	59.00	2,995.37
			<u>175.00</u>	<u>\$10,706.60</u>
JENKINS, LAURA Environmental Protection Specialist	2021	20	78.00	6,899.77
			<u>78.00</u>	<u>\$6,899.77</u>
LINDSEY, WILLIAM GENERAL ATTORNEY	2021	20	27.00	2,125.65
		21	1.25	98.45
		22	1.00	78.73
			<u>29.25</u>	<u>\$2,302.83</u>
MCCOMB, MARTIN Environmental Protection Specialist	2021	17	18.00	1,160.96
		18	58.00	5,005.32
		20	100.00	8,849.71
		21	20.00	1,923.23
			<u>196.00</u>	<u>\$16,939.22</u>
PAYNE, JOSEPH ENVIRONMENTAL ENGINEER (OSC)	2021	20	54.00	1,853.27
			<u>54.00</u>	<u>\$1,853.27</u>
Total Regional Payroll Costs			<u>577.25</u>	<u>\$40,002.81</u>

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Headquarters Payroll Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283

COSTS FROM 01/01/2021 THROUGH 11/30/2021

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
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Regional Travel Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283

COSTS FROM 01/01/2021 THROUGH 11/30/2021

Traveler/Vendor Name	Travel Number	Treasury Schedule	Treasury Schedule Date	Travel Costs
BOWKER, JOHN TAYLOR	TAA08MC3		10/29/2021	1,876.43
ENVIRONMENTAL ENGINEER				
				<hr/> \$1,876.43
GUY, KERRY	TAA08KPW	AVC210245	06/28/2021	2,092.90
Environmental Engineer (Osc)	TAA08KPW	AMP210189	06/28/2021	467.50
	TAA08LDE	AMP210200	07/14/2021	1,237.50
	TAA08LDE	AVC210256	07/14/2021	928.50
				<hr/> \$4,726.40
JENKINS, LAURA	TAA08M65	AVC210261	07/20/2021	1,808.39
Environmental Protection Specialist	TAA08M65	AMP210204	07/20/2021	1,031.44
				<hr/> \$2,839.83
LINDSEY, WILLIAM	TAA08MAO	AVC210259	07/19/2021	1,251.38
GENERAL ATTORNEY	TAA08MAO	AMP210203	07/19/2021	127.50
				<hr/> \$1,378.88
MCCOMB, MARTIN	TAA08KPH	AVC210233	06/10/2021	896.00
Environmental Protection Specialist	TAA08KPH	AMP210177	06/10/2021	631.38
	TAA08LXF	AMP210200	07/14/2021	470.04
	TAA08LXF	AVC210256	07/14/2021	1,953.95
				<hr/> \$3,951.37
PAYNE, JOSEPH	TAA08LXL	AVC210252	07/08/2021	1,432.49
ENVIRONMENTAL ENGINEER (OSC)	TAA08LXL	AMP210196	07/08/2021	302.50
				<hr/> \$1,734.99
Total Regional Travel Costs				<hr/> <hr/> \$16,507.90

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Headquarters Travel Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283

COSTS FROM 01/01/2021 THROUGH 11/30/2021

<u>Traveler/Vendor Name</u>	<u>Travel Number</u>	<u>Treasury Schedule</u>	<u>Treasury Schedule Date</u>	<u>Travel Costs</u>
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Contract Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283

COSTS FROM 01/01/2021 THROUGH 11/30/2021

EMERGENCY RAPID RESPONSE SERVICES (ERRS)

Contractor Name: ENVIRONMENTAL RESTORATION, L.L.C.

EPA Contract Number: 68HE0820D0002

Delivery Order Information	<u>DO #</u>	<u>Start Date</u>	<u>End Date</u>
	68HE0821F0017	05/20/2021	09/12/2021

Project Officer(s): GEYER, REBECCA

Dates of Service: From: 05/20/2021 To: 09/12/2021

Summary of Service: EMERGENCY RESPONSE CONTRACTS-SUB(OSCM)

Total Costs: \$256,761.67

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
821017-01	08/11/2021	73,769.01	AVC210299 09/01/2021	73,769.01
821017-02	10/01/2021	182,992.66	AVC220015 10/20/2021	182,992.66
Total:				<u><u>\$256,761.67</u></u>

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Contract Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283

COSTS FROM 01/01/2021 THROUGH 11/30/2021

SUPERFUND TECHNICAL ASSIST RESPONSE TEAM (STR)

Contractor Name: TETRA TECH, INC.

EPA Contract Number: 68HE0820D0001

Delivery Order Information	<u>DO #</u>	<u>Start Date</u>	<u>End Date</u>
	68HE0820F0071	04/24/2021	08/27/2021

Project Officer(s): ACKERMAN, JOYCE

Dates of Service: From: 04/24/2021 To: 10/01/2021

Summary of Service: S/F TECH ASSESSMENT&RESPONSE TEAM (REDI)

Total Costs: \$89,849.08

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule</u>		<u>Site Amount</u>
			<u>Number</u>	<u>and</u> <u>Date</u>	
20F0071-08	06/23/2021	108,054.63	AVC210254	07/12/2021	45,635.13
B20F0071-09	07/22/2021	90,473.75	AVC210274	08/06/2021	25,990.85
B20F0071-10	08/24/2021	105,777.84	AVC210306	09/10/2021	17,022.97
B20F0071-11	09/20/2021	196,274.69	AVC220001	10/01/2021	1,200.13
Total:					<u>\$89,849.08</u>

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Financial Cost Summary for the Contract Lab Program

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283

COSTS FROM 01/01/2021 THROUGH 11/30/2021

CONTRACT LAB PROGRAM (CLP) COSTS

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Miscellaneous (MIS) Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283

COSTS FROM 01/01/2021 THROUGH 11/30/2021

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EPA Indirect Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283
COSTS FROM 01/01/2021 THROUGH 11/30/2021

<u>Fiscal Year</u>	<u>Direct Costs</u>	<u>Indirect Rate(%)</u>	<u>Indirect Costs</u>
2021	217,052.24	66.99%	145,403.26
2022	186,069.22	66.99%	124,647.75
	<u>403,121.46</u>		
Total EPA Indirect Costs			<u>\$270,051.01</u>

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EPA Indirect Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283

COSTS FROM 01/01/2021 THROUGH 11/30/2021

PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
BOWKER, JOHN TAYLOR	2021	20	1,301.12	66.99%	871.62
			1,301.12		\$871.62
GUY, KERRY	2021	17	1,723.14	66.99%	1,154.33
		18	4,636.54	66.99%	3,106.02
		19	1,351.55	66.99%	905.40
		20	2,995.37	66.99%	2,006.60
			10,706.60		\$7,172.35
JENKINS, LAURA	2021	20	6,899.77	66.99%	4,622.16
			6,899.77		\$4,622.16
LINDSEY, WILLIAM	2021	20	2,125.65	66.99%	1,423.97
		21	98.45	66.99%	65.95
		22	78.73	66.99%	52.74
			2,302.83		\$1,542.66
MCCOMB, MARTIN	2021	17	1,160.96	66.99%	777.73
		18	5,005.32	66.99%	3,353.06
		20	8,849.71	66.99%	5,928.42
		21	1,923.23	66.99%	1,288.37
			16,939.22		\$11,347.58
PAYNE, JOSEPH	2021	20	1,853.27	66.99%	1,241.51
			1,853.27		\$1,241.51
Total Fiscal Year 2021 Payroll Direct Costs:			40,002.81		\$26,797.88

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EPA Indirect Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283

COSTS FROM 01/01/2021 THROUGH 11/30/2021

TRAVEL DIRECT COSTS

<u>Traveler/Vendor Name</u>	<u>Travel Number</u>	<u>Treasury Schedule Date</u>	<u>Travel Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
GUY, KERRY	TAA08KPW	06/28/2021	2,092.90	66.99%	1,402.02
			467.50	66.99%	313.17
	TAA08LDE	07/14/2021	928.50	66.99%	622.01
			1,237.50	66.99%	829.00
			4,726.40		\$3,166.20
JENKINS, LAURA	TAA08M65	07/20/2021	1,031.44	66.99%	690.95
			1,808.39	66.99%	1,211.44
			2,839.83		\$1,902.39
LINDSEY, WILLIAM	TAA08MAO	07/19/2021	127.50	66.99%	85.42
			1,251.38	66.99%	838.30
			1,378.88		\$923.72
MCCOMB, MARTIN	TAA08KPH	06/10/2021	896.00	66.99%	600.23
			631.38	66.99%	422.96
	TAA08LXF	07/14/2021	470.04	66.99%	314.88
			1,953.95	66.99%	1,308.95
			3,951.37		\$2,647.02
PAYNE, JOSEPH	TAA08LXL	07/08/2021	302.50	66.99%	202.64
			1,432.49	66.99%	959.62
			1,734.99		\$1,162.26
Total Fiscal Year 2021 Travel Direct Costs:			14,631.47		\$9,801.59

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EPA Indirect Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283

COSTS FROM 01/01/2021 THROUGH 11/30/2021

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
68HE0820D000120F0071-08		07/12/2021	45,635.13	0.00	66.99%	30,570.97
	B20F0071-09	08/06/2021	16,627.75	0.00	66.99%	11,138.93
			9,363.10	0.00	66.99%	6,272.34
	B20F0071-10	09/10/2021	6,228.87	0.00	66.99%	4,172.72
			10,794.10	0.00	66.99%	7,230.97
			88,648.95	0.00		\$59,385.93
68HE0820D0002821017-01		09/01/2021	73,769.01	0.00	66.99%	49,417.86
			73,769.01	0.00		\$49,417.86
Total Fiscal Year 2021 Other Direct Costs:			162,417.96	0.00		\$108,803.79
Total Fiscal Year 2021:			217,052.24			\$145,403.26

TRAVEL DIRECT COSTS

Traveler/Vendor Name	Travel Number	Treasury Schedule Date	Travel Costs	Ind. Rate (%)	Indirect Costs
BOWKER, JOHN TAYLOR	TAA08MC3	10/29/2021	1,876.43	66.99%	1,257.01
			1,876.43		\$1,257.01
Total Fiscal Year 2022 Travel Direct Costs:			1,876.43		\$1,257.01

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
68HE0820D0001B20F0071-11		10/01/2021	754.73	0.00	66.99%	505.59

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EPA Indirect Costs

PRIDE OF THE WEST MILL, SILVERTON, CO SITE ID = B8 94

EXPENDITURE SUMMARY REPORT - ALL INCLUSIVE - CRP# 194283

COSTS FROM 01/01/2021 THROUGH 11/30/2021

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
68HE0820D0001B20F0071-11		10/01/2021	445.40	0.00	66.99%	298.37
			1,200.13	0.00		\$803.96
68HE0820D0002821017-02		10/20/2021	56,761.67	0.00	66.99%	38,024.64
			75,000.00	0.00	66.99%	50,242.50
			51,230.99	0.00	66.99%	34,319.64
			182,992.66	0.00		\$122,586.78
Total Fiscal Year 2022 Other Direct Costs:			184,192.79	0.00		\$123,390.74
Total Fiscal Year 2022:			186,069.22			\$124,647.75
Total EPA Indirect Costs						\$270,051.01

ATTACHMENT 2

Lien Filing Record Index

Title	Description
EPA Cost Summary for Pride of the West Mill Site	The cost summary documents the costs the EPA has incurred at the Pride of the West Mill Site
Property Record	San Juan County Assessor Information evidences that the Pride of the West LLC is the current owner of the Property; Confirmation Deed and Property Card identifies Grantee for claims as Pride of the West LLC
EPA Pollution Report dated June 4, 2021	The EPA's initial pollution report for the Pride of the West Mill Site documents that the Property subject to the CERCLA section 107(l) lien is contaminated with hazardous substances
Action Memorandum dated June 16, 2021	Th Action Memoradum further documents that the Property subject to the CERCLA section 107(l) lien is contaminated with hazardous substances
EPA Pollution Report dated October 11, 2021	The EPA's second pollution report for the Pride of the West Mill Site has additional information evidencing that the Property subject to the CERCLA section 107(l) lien is contaminated with hazardous substances
Property Map	This shows the general location of the Pride of the West Mill Site in relation to the Upper Animas Water Shed
EPA Response Site: https://response.epa.gov/site/site_profile.aspx?site_id=15211	This website has photo log and a story map with images and videos depicting conditions of and work progress at the Pride of the West Mill Site